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MS Assc. for Home Care 30(b)(6) Rebecca Knight 10/20/2023

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

CHARLES SLAUGHTER

PLAINTIFF

v.

CIVIL ACTION NO. 3:20-cv-789-CWR-FKB

DR. DANIEL P. EDNEY, IN
HIS OFFICIAL CAPACITY AS
THE MISSISSIPPI STATE
HEALTH OFFICER, ET AL.

DEFENDANTS

30(B)(6) DEPOSITION OF
MISSISSIPPI ASSOCIATION FOR HOME CARE

REBECCA KNIGHT

Taken at the instance of the Plaintiff at
Butler Snow, LLP, 1020 Highland Colony Parkway,
Suite 1400, Ridgeland, Mississippi, on Wednesday,
April 19, 2023,
beginning at 8:56 a.m.



REPORTED BY:

GINGER H. BROOKS, CCR #1165
CRR, RPR, CRC, CCR, CLR, RSA

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1 MR. RICE: Objection to form.

2 MR. DAVIS: Ms. Knight, if I thought
3 long enough, I could probably ask more
4 questions, but I'm going to tender the
5 witness.

6 EXAMINATION BY MR. SHELVER:

7 Q. I just have a few questions, very
8 briefly.

9 You mentioned patient census several
10 times today, and I just want you to define or
11 explain what you mean by "patient census" for the
12 Court.

13 A. Patient census is the patients that we
14 serve. It's the unique number.

15 I mean, it's -- we could look at it a
16 couple of different ways.

17 You can look at it as a current. If I
18 were to tell you today I have a patient census of
19 this, that might represent the number of patients
20 that I have currently actively on home care.

21 And then you could also view patient
22 census as patients served, how many patients
23 served that may not -- no longer be active on home
24 care.

25 Q. So if the CON and the moratorium were

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1 removed and the market was opened wide up like
2 Mr. Slaughter wants, explain to me what would
3 happen, generally.

4 A. Well, generally, that patient census
5 would decline, and it would be dispersed among who
6 knows how many companies, and then you would see a
7 lack of investment dollars to improve care. I
8 believe you would see that increased opportunity
9 for fraud. And I believe that because that's what
10 we see. We've seen that in other states.

11 Q. If you had to tell the Court which parts
12 of the state would be more adversely affected by
13 the reduction in the patient census, what would
14 you say?

15 A. The rural areas.

16 Q. Rural areas?

17 A. Absolutely.

18 Q. Why is that?

19 A. Because, again, in order to even operate
20 with positive margins, you have to have a patient
21 population that's going to support that, and you
22 would -- you would tend to migrate to those
23 geographies where the density of that patient
24 population was greater.

25 Q. In Mississippi, where are the greatest

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1 CERTIFICATE OF COURT REPORTER

2 I, Ginger H. Brooks, Court Reporter and
3 Notary Public, in and for the State of
4 Mississippi, hereby certify that the foregoing
5 contains a true and correct transcript of the
6 testimony of REBECCA KNIGHT, as taken by me in the
7 aforementioned matter at the time and place
8 heretofore stated, as taken by stenotype and later
9 reduced to typewritten form under my supervision
10 by means of computer-aided transcription.

11 I further certify that under the
12 authority vested in me by the State of Mississippi
13 that the witness was placed under oath by me to
14 truthfully answer all questions in the matter.

15 I further certify that, to the best of
16 my knowledge, I am not in the employ of or related
17 to any party in this matter and have no interest,
18 monetary or otherwise, in the final outcome of
19 this matter.

20 Witness my signature and seal this the
21 9th day of November, 2023.

22

23

24

My Commission Expires:
25 September 18, 2025


GINGER H. BROOKS, #1165
CRR, RPR, CCR